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10 Attorneys for Plaintiff  
11 UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

## WESTERN DIVISION

26 On or about October 3, 2012, Plaintiff United States of  
27 America ("the government," "the United States of America" or  
28 "plaintiff") filed a Complaint for Forfeiture alleging that the

1 defendant \$20,000.00 in U.S. Currency (the "defendant currency") is  
2 subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 21  
3 U.S.C. § 881(a)(6).

4 Claimants Gayane Galoyan and Armen Galoyan (collectively,  
5 "claimants") filed their respective claims to the defendant  
6 currency on or about December 20, 2012. No other parties have  
7 appeared in this case and the time for filing claims and answers  
8 has expired.

9 The government and claimants have now agreed to settle this  
10 action without any admission of any wrongdoing and to avoid further  
11 litigation by entering into this Consent Judgment of Forfeiture.

12 The Court, having been duly advised of and having considered  
13 the matter, and based upon the mutual consent of the parties  
14 hereto,

15 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

16 1. This Court has jurisdiction over the subject matter of  
17 this action and the parties to this Consent Judgment of Forfeiture.

18 2. The Complaint for Forfeiture states a claim for relief  
19 pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6).

20 3. Notice of this action has been given as required by law.  
21 No appearances have been made in the litigation by any person other  
22 than claimants. The Court deems that all other potential claimants  
23 admit the allegations of the Complaint for Forfeiture to be true.

24 4. The sum of \$1,000.00 only (without interest) shall be  
25 returned to claimant Gayane Galoyan. The remainder of the  
26 defendant currency (i.e., \$19,000.00), plus the interest earned by  
27 the United States of America on the defendant currency shall be  
28 condemned and forfeited to the United States of America, which

1 shall dispose of those funds in accordance with law.

2       5. The funds to be returned to claimant Gayane Galoyan  
3 pursuant to paragraph 4 above shall be paid to claimant Gayane  
4 Galoyan by electronic transfer into the client trust account of  
5 Jacek W. Lentz, attorney of record for claimants in this case.  
6 Claimant Gayane Galoyan (through her attorney Jacek W. Lentz)  
7 shall provide all information and complete all documents requested  
8 by the United States of America in order for the United States of  
9 America to process the transfer including, without limitation,  
10 providing claimant's social security and taxpayer identification  
11 numbers (if any), and the identity of the bank, the bank's address  
12 and the account name, account number, account type and wire  
13 transfer routing number for the Jacek W. Lentz trust account to  
14 which the transfer of funds is to be made.

15       6. Claimants, and each of them, hereby release the United  
16 States of America, its agencies, agents, officers, employees and  
17 representatives, including, without limitation, all agents,  
18 officers, employees and representatives of the Drug Enforcement  
19 Administration and the Department of Justice and their respective  
20 agencies, as well as all agents, officers, employees and  
21 representatives of any state or local governmental or law  
22 enforcement agency involved in the investigation or prosecution of  
23 this matter, from any and all claims, actions, or liabilities  
24 arising out of or related to this action, including, without  
25 limitation, any claim for attorney fees, costs, and interest, which  
26 may be asserted by or on behalf of claimants, or either of them.

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1       7. The Court finds that there was reasonable cause for the  
2 seizure of the defendant currency and institution of these  
3 proceedings. This judgment shall be construed as a certificate of  
4 reasonable cause pursuant to 28 U.S.C. § 2465.

5       8. The parties hereto shall bear their own attorney fees and  
6 costs.

7                     DATED: 5/6/13



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8                     THE HONORABLE JESUS G. BERNAL  
9                     UNITED STATES DISTRICT JUDGE

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## CONSENT

The parties hereto consent to the above judgment and waive any right of appeal.

DATED: April 15, 2013

ANDRÉ BIROTTÉ JR.  
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ROBERT E. DUGDALE  
Assistant United States Attorney  
Chief, Criminal Division  
STEVEN R. WELK  
Assistant United States Attorney  
Chief, Asset Forfeiture Section

/s/ Victor A. Rodgers

VICTOR A. RODGERS  
Assistant United States Attorney  
  
Attorneys for Plaintiff  
UNITED STATES OF AMERICA

DATED: April 15, 2013

LAW OFFICES OF JACEK W. LENTZ

/s/ Jacek W. Lentz

JACEK W. LENTZ

Attorneys for Claimants  
GAYANE GALOYAN and  
ARMEN GALOYAN